

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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PARAGON COMPONENT SYSTEMS, LLC,

Plaintiffs,

Case No.: 3:25-cv-00170-wmc

QUALTIM INC., CENTER FOR BUILDING  
INNOVATION LLC, DRJ ENGINEERING LLC,  
INSPIRED PURSUITS LLC, KIRK GRUNDAHL,  
AND SUZANNE GRUNDAHL

Defendants.

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**DECLARATION OF MAYVILLE LA ROSA IN SUPPORT OF DEFENDANTS'  
OPPOSITION TO PLAINTIFF'S MOTION TO COMPEL**

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1. I am an attorney of record representing All Defendants in the above captioned matter. I make this declaration in support All Defendants' opposition to Paragon's Motion to Compel.
2. Attached hereto as Exhibit B is a true and correct copy of Paragon's Rule 26 Initial Disclosures served on counsel of All Defendants on November 15, 2024.
3. Attached hereto as Exhibit C is a true and correct copy of an email from Attorney Erin Steelman to Attorney Mayville La Rosa on August 1, 2025.
4. Attached hereto as Exhibit D is a true and correct copy of a discovery file Defendants received from Paragon. Trade secret information has been redacted to protect the interests of the trade secret owner.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 13, 2025.

/s/Mayville La Rosa

Mayville La Rosa, WI Bar No. 1119613